

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

As representative of

THE COMMONWEALTH OF PUERTO
RICO, *et al.*,

Debtors¹

PROMESA
Title III

No. 17 BK 3283-LTS

Re: ECF No. 24050

***INTERNATIONAL TRAFFIC SYSTEMS, LLC’S UNCONTESTED URGENT MOTION TO
EXTEND DEADLINE TO FILE A RESPONSE TO THE FIVE HUNDRED SEVENTIETH
OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO
RICO, THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO, THE PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY, AND PUERTO RICO PUBLIC BUILDINGS
AUTHORITY TO CLAIMS FOR WHICH THE DEBTORS ARE NOT LIABLE***

COMES NOW, International Traffics Systems, LLC (“ITS”), by and through the undersigned legal counsel, and after meeting and conferring with Debtors’ counsel respectfully submits this urgent uncontested motion (the “Urgent Motion”) to extend the deadline for ITS to file a response to the *Five Hundred Seventieth Omnibus Objection (Substantive) Of The Commonwealth Of Puerto Rico, The Employees Retirement System Of The Government Of The Commonwealth Of Puerto Rico, The Puerto Rico Highways And Transportation Authority, And*

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

Puerto Rico Public Buildings Authority To Claims For Which The Debtors Are Not Liable (the “Five Hundred Seventieth Omnibus Objection”). Dkt. No. 24050.

BACKGROUND

1. ITS filed its Proof of Claim asserting in the amount of \$8,194,673.75 on June 29, 2018 (the “Proof of Claim”). *See* Claim Number 79073.
2. On April 20, 2023, Debtors filed the Five Hundred Seventieth Omnibus Objection requesting the disallowance of ITS’ Proof of Claim. *See* Dkt. No. 24050.
3. ITS deadline to respond to the Five Hundred Seventieth Omnibus Objection is due on Monday, May 22, 2023 (the “Response Deadline”). *See Id.* at 1.

RELIEF REQUESTED

1. The undersigned received extensive documentation from ITS related to the Proof of Claim on Monday, May 15, 2023.
2. Upon receipt of this documentation, ITS met and conferred with counsel for Debtors yesterday, May 17, 2023, to inform that it would be filing the instant Urgent Motion to ascertain whether they had an objection to a 30-day extension to file a response to the Five Hundred Seventieth Omnibus Objection. Debtors’ counsel informed that they did not.
3. ITS therefore submits this Urgent motion to request an extension of the Response Deadline to permit ITS to file an adequate response to the Five Hundred Seventieth Omnibus Objection. ITS respectfully requests, on an urgent basis, that the Court grant it a 30-day extension to file its response, which extension shall commence from the Response Deadline of May 22, 2023, and would be due on June 22, 2023.

COMPLIANCE WITH CASE MANAGEMENT PROCEDURES

4. Pursuant to Paragraph I.H of the *Sixteenth Amended Notice, Case Management and Administrative Procedures* Order (Docket No. 20190-2 of Case No. 17-03283 (LTS)) (the

“CMP Order”), ITS hereby certifies that it has (a) carefully examined the matter and concluded that there is a true need for an urgent decision; (b) not created the urgency through any lack of due diligence; and (c) reasonable, good-faith communications took place with the parties to this adversary proceeding to resolve or narrow the issues before the Court. Specifically, counsel for ITS reached out to counsel for Debtors on May 17, 2023, who informed that they did not have an objection to ITS’ 30-day extension request. In addition, ITS certifies that no prior request for the relief sought herein has been made.

WHEREFORE, ITS hereby requests, on an urgent basis, that the Court (i) enter an order substantially in the form attached hereto as **Exhibit A** granting it a 30-day extension, until June 22, 2023, to file its response to Five Hundred Seventieth Omnibus Objection; and (ii) enter any other relief that is just or appropriate given the circumstances.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 18th day of May 2023.

CERTIFICATE OF SERVICE: In accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court’s CMP Order, we hereby certify that a true and exact copy of the foregoing was sent by electronic mail upon all the parties listed in the Master Service List and by U.S. mail upon all the Standard Parties listed in the CMP Order.

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